



BellSouth Telecommunications, Inc.  
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REC'D TN  
REGULATORY AUTH.

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OFFICE OF THE  
EXECUTIVE SECRETARY

Guy M. Hicks  
General Counsel

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May 22, 2002

**VIA HAND DELIVERY**

Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

Re: *Generic Docket to Consider Technology Advances and Geographic  
Deaveraging*  
Docket No. 01-00339

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of BellSouth's Petition to Intervene in the above-referenced matter. A copy of the enclosed is being provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH/jej

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

IN RE:       *Generic Docket to Consider Technology Advances and Geographic  
Deaveraging*

Docket No. 01-00339

**PETITION OF BELL SOUTH TELECOMMUNICATIONS, INC.  
FOR LEAVE TO INTERVENE**

BellSouth Telecommunications, Inc., pursuant to T.C.A. §4-5-310 and T.C.A. §65-2-107, petitions the Tennessee Regulatory Authority (the "Authority") for leave to intervene in the above-captioned proceeding, and in support thereof states as follows:

1.     Petitioner, a Georgia Corporation authorized to conduct and conducting a public utility business in the state of Tennessee, is engaged in furnishing exchange telephone service and intrastate (long distance) intraLATA telephone service in the state of Tennessee subject to the jurisdiction of the Authority and pursuant to T.C.A. §65-4-101 and T.C.A. §65-5-201, *et seq.*
2.     Petitioner has an interest in the Authority's review of deaveraging methodology.
3.     Petitioner's legal interests may be determined in the proceedings and Petitioner's interests will not be adequately represented unless the Authority allows the petitioner to intervene.

4. Allowing Petitioner to intervene will not impair the interests of justice or the orderly and prompt conduct of these proceedings.

5. Petitioner respectfully requests that it be granted leave to intervene and participate as a party in the above-captioned proceeding.

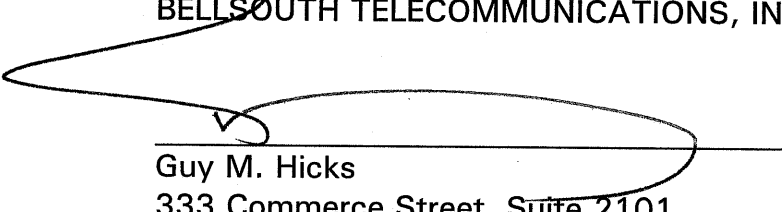
WHEREFORE, Petitioner prays:

1. That it be permitted to intervene in this proceeding and participate as a party.

2. That Petitioner have such other and further relief to which it may be entitled.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



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**CERTIFICATE OF SERVICE**

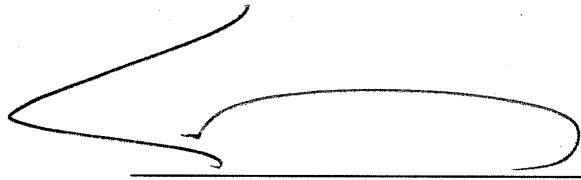
I hereby certify that on May 22, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
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